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12 *Attorneys for Defendant*

13 BRIAN BORENSTEIN,

14 Plaintiff,

15 v.

16 THE ANIMAL FOUNDATION, et al.,

17 Defendants.

18 Case No.: 2:19-cv-00985-APG-DJA

19 **STIPULATION AND [PROPOSED]
20 ORDER TO EXTEND TIME FOR
DEFENDANTS THE ANIMAL
FOUNDATION & CARLY SCHOLLEN
TO REPLY TO PLAINTIFF'S SECOND
AMENDED COMPLAINT [ECF NO. 189]**

21 **[SECOND REQUEST]**

22 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, BRIAN
23 BORENSTEIN, and Defendant, CARLY SCHOLLEN, by and through their undersigned counsel,
24 that Defendants The Animal Foundation (“TAF”) and Ms. Carly Scholten (collectively with TAF
the “TAF Defendants”) may have additional time within which to respond to Plaintiff’s Second
25 Amended Complaint [ECF No. 189].

26 Plaintiff’s Second Amended Complaint was filed on August 23, 2021. Defense counsel has
27 requested an additional week to prepare a response, to which counsel for Plaintiff’s has graciously
28 agreed. Therefore, the parties hereby stipulate that the last day for TAF Defendants to respond to
Monday, September 20, 2021.

29 Further, in light of travel plans and other obligations of Plaintiff’s counsel, the Parties
30 stipulate and request that Plaintiff’s deadline to file a reply thereto be extended for a week from
31 Tuesday, October 5, 2021 to **Friday, October 15, 2021.**

1 This request is made in good faith and not for the purpose of undue delay. This document
2 is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for
3 Defendants hereby attests that (1) the content of this document is acceptable to all persons required
4 to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and
5 has authorized defense counsel to affix his electronic signature hereto; and (3) a record supporting
6 this concurrence could be made available if so ordered by this Court.

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8 Dated this 14th day of September, 2021.

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10 Respectfully submitted,

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12 REID RUBINSTEIN & BOGATZ

13
14 By: /s/ Kerry E. Kleiman
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 Attorneys for Plaintiff

21 **ORDER**

22 IT IS SO ORDERED.

23 DATED this 15th day of September 2021.

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 DANIEL J. ALBRECHTS
 UNITED STATES MAGISTRATE JUDGE